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DEPARTMENT OF THE ARMY UNITED STATES ARMY LEGAL SERVICES AGENCY 901 NORTH STUART STREET ARLINGTON VA 22203-1837

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September 30, 2005

REPLY TO ATTENTION OF Regulatory Law Office U 4136

Subject: <u>In The Matter Of The Application Of Southwest Gas Corporation For A Rate Increase</u>, Arizona Corporation Commission, Docket No. G-01551-04-0876.

Arizona Corporation Commission Docket Control 1200 West Washington Street Phoenix, Arizona 85007

Enclosed for filing with the Arizona Corporation Commission are the original and thirteen copies of the Summary of the Surrebuttal Testimony of Dan L. Neidlinger on Behalf of the Department of Defense in the subject proceeding.

Copies of this Summary have been sent in accordance with the attached Certificate of Service. Inquiries concerning this matter may be directed to the undersigned at (703) 696-1644.

Sincerely

Peter Q. Nyce Jr.

General Attorney

Regulatory Law Office

Enclosure

CORP COMMISSION

ARIZONA CORPORATION COMMISSION SOUTHWEST GAS CORPORATION DOCKET NO. G-01551A-04-0876

Summary of the Surrebuttal Testimony of Dan L. Neidlinger

Mr. Neidlinger supports the Company's proposal to consolidate the Armed Forces tariff, Rate Schedule G-35, with the Large General Gas Service tariff, Rate Schedule G-25. He also recommends changing the current method of measuring demand from a system peak method to a modified noncoincident peak demand method. Finally, he supports RUCO's proposed G-25 rates for large, transportation eligible, gas customers.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Summary of the Surrebuttal Testimony of Dan L. Neidlinger on Behalf of the United States Department of Defense was sent to the parties on the attached service list either by United Parcel Service Next Day Air or by first class mail, postage prepaid on September 30, 2005.

Dated at Arlington County, Virginia, this 30th day of September 2005.

ETER Q. NYCE, JR.

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